

THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA
Plaintiff,

Civil Docket No. 1:21-cv-10156-GAO

V.

5 REAL PROPERTIES and 40
ACCOUNTS AND INVESTMENTS
Defendants.

**VERIFIED CLAIM OF ARBOR HOMECARE SERVICES LLC TO DEFENDANT
PROPERTY IN FORFEITURE PROCEEDING *IN REM***

Pursuant to 18 U.S.C. § 983(a)(4) and Federal Rule of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions G(5) (“Supp. R. G(5)”), claimant, Arbor Homecare Services LLC (“Arbor”), by and through its undersigned counsel, hereby submits this Verified Claim for certain property seized by the federal government which is presently the defendant in the above-captioned forfeiture proceeding in rem.

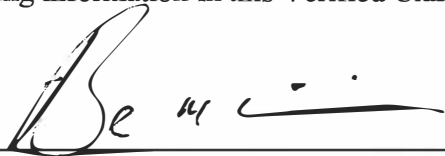
I. Identification of the Specific Property Claimed

Pursuant to Supp. R. G(5)(a)(i)(A), Arbor claims the following defendant property and pursuant to Supp. R. G(5)(a)(i)(B), it identifies Arbor as having the following interests in the Verified Complaint for Forfeiture *In Rem* ("the Complaint"):

	Property Claimed by Arbor	Interest in Property	Complaint Cite (pg.)
i.	Real property located at 440 Great Pond Road in North Andover for \$2,000,000,	Owned by Arbor; Benjamin N. Muiruri was the sole owner of Arbor prior to its dissolution.	17, ¶ b
ii.	All funds on deposit in Northern Bank and Trust Company account number 8137210800.	Held in the name of Arbor Homecare.	40, ¶ qq

	number 8137210800.		
iii.	All funds on deposit in Northern Bank and Trust Company account number 4763346802.	Held in the name of Arbor Homecare.	41, ¶ rr
iv.	All funds on deposit in Align Credit Union account number 76382-1.	Held in the name of Arbor Homecare.	41, ¶ ss

Pursuant to Supp. R. G(5)(a)(I){C). Arbor states under the penalties of perjury that the foregoing information in this Verified Claim is true and correct.



Benjamin N. Muiruri on behalf of
Arbor Homecare Services LLC

In submitting this claim through counsel, Arbor Homecare Services LLC does so to establish its standing and to state a claim in order to contest this civil forfeiture action as required by applicable statutes, court rules, and the U.S. Constitution. In submitting these claims, Arbor does not waive, and expressly reserves, any rights pursuant to the Fifth amendment to the U.S. Constitution in connection with the ongoing criminal proceedings.

Dated: April 5, 2021

Respectfully submitted,

Arbor Homecare Services LLC

By its attorney,

/s/ Laurence Cote

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-participants on April 8, 2021. A paper copy will also be served upon David G. Lazarus, Esq., and Rachel Y. Hemani, Esq., the Assistant U.S. Attorneys designated to receive this claim under Fed. R. Civ. P. Supp. R. G(5)(a)(i)(D).

/s/ Laurence Cote

Laurence Cote